

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In Re: Samir Jayesh Joshi : Case No: 24-53599
Debtor(s) : Chapter 13 Judge: Mina Nami Khorrami
:

CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION

Now comes Edward A. Bailey, Standing Chapter 13 Trustee, and objects to the confirmation of the plan and requests that the Court enter an Order denying confirmation for the reasons set forth below and dismissing the case, pursuant to 11 U.S.C. §1307. This objection supersedes any prior objection filed in this case by the Trustee.

Above median income _____ Below median income X

X **11 U.S.C. §1325(a)(1)**-Plan does not comply with all provisions of Chapter 13 of Title 11 and the other applicable provisions of Title 11:

X Debtor is delinquent on plan payments.

X Other: **Amended Plan nonstandard provisions does not provide for what will happen in the event the adversary proceeding is unsuccessful.**

Therefore, the Trustee prays that confirmation is denied and this case be dismissed for cause pursuant to §1307(c).

TERMS OF THE PLAN:

Plan Payments: \$400 for 3 months, \$580 per month for the duration of the plan.

Best Interest Dividend: 27% Dividend: 27%

Length: 36 Months

Dated: March 31, 2025

Respectfully submitted,

/s/ Edward A. Bailey

Edward A. Bailey (0068073)

Chapter 13 Trustee

550 Polaris Parkway, Suite 500

Westerville, OH 43082

Tel: (614)-436-6700

Fax: (614)-436-0190

Email: trustee@ch13.org

CERTIFICATE OF SERVICE

The undersigned hereby certified that on the date shown below a copy of the Trustee's Objection to Confirmation was served electronically on the Office of the United States Trustee and Debtor's attorney, and on the Debtor(s) at the address as currently shown in the Trustee's records by regular first class mail, postage prepaid.

Dated: March 31, 2025

/s/ Edward A. Bailey

Edward A. Bailey (0068073)

Chapter 13 Trustee

550 Polaris Parkway, Suite 500

Westerville, OH 43082

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